

SDP-ITA-PO 01-INTEGRATED MANAGEMENT SYSTEM POLICY

SDP-ITA-PO 01-MQI_5.2.A1 Integrated Management System Policy

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Any other source is not official and therefore not reliable.

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1 GENERAL ELEMENTS ON THE INTEGRATED MANAGEMENT SYSTEM POLICY

1.1 Objectives of Dedalus

The goal of Dedalus is to consolidate its role as a leader in the global Health Care Systems market.

1.2 Contents and parts of the Integrated Management System Policy of Dedalus Group

To reach this goal, Top Management of Dedalus Group has defined this **Integrated Management System Policy** for the whole organization.

The policy **contains the strategic elements** that are the keys to maintain an effective and efficient:

1. Quality Management System (**QMS**) built on **ISO 9001** standard
2. Service Management System (**SMS**), built on **ISO/IEC 20000-1** standard
3. Information Security Management System (**ISMS**), built on **ISO/IEC 27001** and its extensions ISO/IEC 27017 and ISO/IEC 27018
4. Environmental Management System (**EMS**), built on **ISO 14001** standard
5. Quality Management System for Medical Devices (**MDQMS**) built on **ISO 13485** standard
6. Social Accountability Management System (**SGRS**), in compliance with the **SA 8000** standard
7. Gender Equality Management System (**GEMS**), in compliance with **UNI PRD 125** practice

1.3 Parts of the Integrated Management System Policy of Dedalus

Top Management of Dedalus Group ensures that this policy:

- is **appropriate to the purpose and context of the organization** and supports its strategic goals;
- provides a **framework for setting goals** for all applicable management systems;
- includes a **commitment to meet the applicable requirements** of all management systems, including mandatory and contractual requirements, and to continually **improve the management systems and their effectiveness**;



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- includes the organisation's **commitment** to comply with the international documents as listed in section II of SA 8000 on **Normative Elements** and their Interpretation;
- includes a commitment to **comply with national laws**, other applicable laws and other requirements to which it subscribes;
- includes a **commitment to gender equality**;
- is **available** as documented information;
- is **communicated, understood, and applied** within the organization;
- is made available to relevant stakeholders;
- is **reviewed** periodically for continued suitability.

2 POLICY FOR OVERALL QUALITY, SERVICE MANAGEMENT AND MEDICAL DEVICE MANAGEMENT

2.1 Standards applicable to the section

This section of the IMS policy refers specifically to the requirements of **ISO 9001, ISO/IEC 20000-1, and ISO 13485**.

2.2 Applicable principles

Top Management strongly believes that the adoption of an IMS results in great benefits in terms of value for our customer and of internal organization improvements, and it has defined the Quality Policy of Dedalus Group, that is built on these **principles**:

- Guarantee and constantly improve **customer satisfaction**, meeting their expectations and complying with **product and service requirements** in order to become a reliable and strategic partner for them;
- Ensure that **customers receive real value through** the delivery of Dedalus Group **services** and the adherence to defined Service Level Agreements;
- Develop **continuous improvement in the quality of our products, services**, and in the Quality System **effectiveness**;
- **Promptly respond to market** developments through a flexible, highly competent and worldwide competitive organization;
- Achieve and constantly maintain the **compliance of our medical devices with all the regulatory requirements** of the markets where we sell;
- **Involve the entire staff** in processes, supporting them to constantly **grow on their skills** and encouraging them to feel and act as a fundamental part for the quality



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system and for the continuous improvement of the organization, its products and services.

2.3 What to do to put these principles in practice

The implementation of this policy involved the activation of the following **actions**:

- defining and specifying the **responsibilities, roles, tasks** for the different phases of the processes;
- developing **internal rules** that have been taken on as organizational, procedural and operational reference standards in the management of activities;
- **prevent** the occurrence of **non-conformities** during the performance of processes;
- identify and record non-conformities, promoting the activation of appropriate **corrective actions** and the consolidation of the solutions adopted;
- Promote the **development** of the **skills of professional resources**, promoting integration and collaboration between internal organizational areas and activating permanent training actions;
- enhance the **value of the know-how** possessed, activating the dissemination of good practices and pursuing their optimization in order to make common heritage, working methods and acquired experiences;
- ensure the promotion of the **focus on the customer** throughout the organization, as well as the integrity of the management system itself.

Dedalus Top Management has established appropriate **internal communication** processes such as, for example, through the company website, e-mail, newsletters, video conferences, physical and virtual meetings/meetings between work groups, tools and instruments for sharing information with the utmost respect for the security of such information.

For **external communication** the following tools are basically used: advertising, production of brochures and informative documentation about the organization, websites, organization of events, press office activities, participation in events, knowledge sharing portals, company areas specifically dedicated to experimentation and involvement of customers and stakeholders in knowledge development processes.



3 INFORMATION SECURITY MANAGEMENT POLICY EXTENDED TO CLOUD COMPUTING

3.1 Standards applicable to the section

This is the part of the IMS policy which is specifically referred to ISMS and to the requirements of

- **ISO/IEC 27001** standard
including extensions to the guidelines:
- **ISO/IEC 27017** for cloud computing and
- **ISO/IEC 27018** for the management of personal information in public clouds managed by data controllers.

3.2 ISMS key principles

In our ISMS information is a strategic asset and it is of vital importance to ensure and preserve confidentiality, integrity and availability of all handled data (the so-called "RID" paradigm), according to the requirements of ISO/IEC 27001.

The main principles for the ISMS of Dedalus Group are:

- the **confidentiality** of the information managed: it has not to be made available or disclosed to unauthorized individuals, entities, or processes;
- the **integrity** of the information managed, e.g., that data and information are protected from unauthorized modifications;
- the **availability** of the managed information assets, so that information is always accessible by authorized users when it is necessary;
- **compliance** with all the applicable mandatory, regulatory and contractual requirements, with particular reference to the ones of **GDPR** (EU Regulation 2016/679), and all the specific privacy regulations applicable to the markets here we work, as Dedalus also processes 'special' data, as defined by the GDPR; this principle is also to be understood as Dedalus' support and commitment to achieve compliance with personal information protection legislation and the contractual requirements agreed between Dedalus acting as data processor and its customers;
- the design, realization and maintenance of effective **business continuity plans** for all the processes that are critical for business and for the management of the information security;



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- ensure adequate **training of personnel** on information security and on the applicable privacy regulations;
- guarantee the prompt and careful **management of all** information security possible **violations** and of the identifiable weak points, in order to promptly detect, fully investigate and manage them, to improve continuously the ISMS and ensure regulation compliance.

3.3 What to do to put these principles in practice

In order to guarantee the concrete application of these key principles, Dedalus Group has defined and keeps up-to-date its **objectives for information security**, as described in its ISMS.

Dedalus Group has defined the criteria for the **evaluation of information security risks**, considering the strategic value for the organization of the application of the ISMS, the expectations and perceptions of the interested parties (stakeholders) and the possible image damage for the company that could result from an incorrect management of this very important area. DEDALUS has defined and documented a procedure for the timely reporting and handling of information security incidents, especially when they involve personal data (Data Breach) with a clear indication of roles and corrective actions to be taken.

Dedalus Group is aware that information security is not just a product/technological system to be purchased, but is a very **complex cultural process** that must involve all of the human and organization resources of the company.

For this reason, Top Management is committed to continuously meet the applicable and relevant information security requirements according to ISO/IEC 27001 and to ensure the **continuous improvement** of the ISMS itself.

3.4 Information security policy for the cloud

Dedalus' information security policy covers both the management and the use of cloud services in SaaS, IaaS and PaaS modes, in order to provide its customers with high quality, reliable and secure services, in compliance with the legal requirements and standards imposed by the market, regulations and contracts.

In the context of these cloud services, **when Dedalus operates as a service provider for its customers**, it has defined and keeps under control:

- the delivery methods of its cloud services (also in SaaS mode), including their SLAs also in terms of their availability;
- the management of access to the services provided in cloud mode, according to a policy agreed with the customer for access management;



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- communications to customers in case of change and to customers, authorities and interested parties in case of data breach;
- the lifecycle of accounts related to cloud services and the way they are managed by the system administrators involved;
- the performance of risk analysis related to the provision of cloud services;
- the application of the mandatory requirements derived from the European Data Protection Regulation (GDPR), considering the specificities of cloud environments.

When using services provided by cloud service providers (particularly in IaaS and PaaS modes, which can be incorporated into its own services), Dedalus has defined and keeps under control, among other elements:

- the requirements, including those relating to the security of information, of the services provided by the cloud providers used (including in IaaS and PaaS mode) to ensure that they are in line with its own requirements, those required by its accreditations and the contractual requirements established with its customers;
- the contractual agreements for cloud services to ensure that they are drafted clearly defining the responsibilities for the handling of data in the cloud, including any sub-contractors
- the modalities of storage and access to information in the cloud by cloud service providers;
- the modalities for maintaining any multi-tenant environments in the cloud, in order to always guarantee an adequate level of data protection and segregation in relation to the agreed contractual requirements and to the risk analysis of cloud services carried out
- the lifecycle and management modalities of users who benefit from cloud services and the context in which they use them;
- the identification and management of administrator users of cloud services used in customer mode, with privileged access;
- the geographic location of cloud service providers and the countries in which the provider may store personal and confidential data, even temporarily, in order to allow adequate management of the legislative and contractual constraints operating on them.

This policy also applies to the case in which **Dedalus operates as a Data Processor of personal data in public clouds** (also in SaaS or IaaS or PaaS mode), in relation to which it is specified that the aforementioned principle of **compliance** with mandatory, regulatory and contractual requirements must also be understood as Dedalus' support



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and commitment to achieve compliance with the legislation for the protection of personal information and with the contractual requirements agreed between Dedalus acting as data processor and its customers, in accordance with the provisions of ISO / IEC 27018.

4 ENVIRONMENTAL POLICY

4.1 Standards applicable to the section

This is the part of the IMS policy which is specifically referred to EMS and to the requirements of **ISO 14001** standard.

4.2 Applicable principles

The environmental impacts of the work processes and activities of Dedalus Group are very low, as we are a service company; however, the company's management believes it is very important that the **organization's activities** are performed with a focus on protecting and **respecting the environment, preventing pollution and minimizing the environmental impacts due to energy consumption and carbon footprint**, as well as **the importance of commitment to green design of ICT infrastructures..**

To this end, the IMS has also been developed to ensure the continuous reduction of the impact on the environment that the organization's activities may have, in accordance with the requirements of ISO 14001.

The general **goals** of our EMS are:

- Ensure **compliance with** and continued **adherence to applicable legislative** and contractual **requirements** that impact the **environment**;
- **Continuously improve the environmental performances** of the organization's processes in terms of reducing their impact on the environment, lowering the energy consumption, reducing Dedalus carbon footprint, commit to green design of ICT infrastructures, as well as preventing and minimization the pollution directly or indirectly associated to the organization processes.

These general objectives are then detailed from year to year through specific targets, which may include, for example, the following: reducing impacts related to travel for business activities, increasing environmental sustainability in offices and encouraging sustainable purchasing, reuse and recycling, and finally promoting a reduction in the amount of emails sent.



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4.3 What to do to put these principles in practice

These objectives become concrete through formal **plans** to reduce environmental impacts, **environmental targets** fixed in accordance to them and **periodical checks** on their achievement.

The EMS is first of all targeted on the own organization of Dedalus Group, where the actions taken can have the highest impact, but as far as possible Dedalus Group aims also to promote consistent and environmentally conscious behaviour **of all its suppliers, customers and stakeholders** in general.

5 SOCIAL RESPONSIBILITY POLICY

5.1 Standards applicable to the section

The part of the Quality Management System that concerns Social Responsibility is the SGRS (Social Responsibility Management System); the reference standard for this system is SA8000.

5.2 Applicable principles

The Management gives all areas the mandate to continuously and systematically improve health and safety performance, risk reduction and the defence of human and labour rights. The Management undertakes not to supply or realise products/services if work activities cannot be carried out in complete safety for personnel and the environment and for people's rights and dignity. The Management also aims to increase the company's potential in terms of employment and growth.

In particular, the applicable principles are as follows:

- Promotion of the involvement and conscious participation of the organisation's Personnel at all levels in the implementation of the Integrated Management System, also involving subcontractors who work permanently with the organisation;
- Commitment to constant updating and compliance with the legislation in force and all other prescriptions subscribed to by the organisation including the SA8000 standard and the norms and laws referred to therein;
- Attention to resources and awareness of the importance of their role in the company dynamic, which attributes a pre-eminent role to the training and development of all personnel;
- Continuous and constant research that moves and projects the company workforce towards cutting-edge solutions and technologies that respect health and safety and have a low environmental impact;



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- Continuous joint participation of workers and management in the protection of human rights to identify and correct non-conformities and ensure compliance is maintained;
- Constant commitment to comply with all the requirements of the standard for Social Responsibility and compliance with appropriate international instruments (ILO-UN etc.);
- Commitment not to employ, in its workforce, personnel that may fall within the definition of "child" or "young worker" and/or prohibition to support other realities that use or favour child labour;
- Promotion of dialogue and confrontation with all internal and external stakeholders (public authorities, citizens, associations, etc.), taking into account their instances, needs and expectations by activating appropriate tools for participation and communicating the performance of company activities in a transparent manner.

To this end, the Integrated Management System was also developed to guarantee the continuous improvement of processes and activities of the social responsibility system, in compliance with the requirements of the SA8000 standard.

The general objectives of the IMS are

- to ensure compliance and **continuous observance of the applicable legislative and contractual requirements** that have an impact **on social responsibility**;
- to **continuously improve the organisation's processes** in relation to their impact on social responsibility.

These general objectives are then detailed year by year through specific objectives, which may include, for example, the following: improving gender equality, fostering the internal training of people, improving the organisation's social commitment, disseminating the principles of social responsibility along its supply chain.

5.3 Actions developed

These objectives are made concrete through the **planning of activities to improve the responsibility system**, the achievement of which is periodically verified.

6 GENERAL AND SPECIFIC GENDER EQUALITY POLICIES

6.1 Standards applicable to the section

The part of the Integrated Management System that concerns Gender Equality is the GEMS (Gender Equality Management System); the reference standard for this system is the **UNI/PDR 125** practice.



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6.2 General gender equality policy

The Management of Dedalus, **in coordination with the Gender Equality Steering Committee (Comitato Guida per la Parità di Genere)** and in accordance with the DNA value of the Dedalus Group, has established this general gender equality policy.

The person responsible for coordinating the implementation of this gender equality policy is the Director of Human Resources for Dedalus Italia, in alignment with the Group's D&I strategy.

This policy stipulates that:

- At Dedalus, **innovation begins with inclusion**. As a company, we are guided by **our core values** and know that diversity and inclusion are **key factors in our success and growth**.
- Our international presence brings together people from all over the world, so we strive to **value diverse backgrounds, skills and experiences** and create **an environment that reflects the many communities we reach**.
- "Pursuing diversity and inclusion" is one of our core values and a part of our Dedalus DNA, which drives us to create a **respectful, diverse and inclusive environment** that recognises **the unique needs, perspectives and potential** of all members of our community. Dedalus is proud to promote diversity, inclusion, fairness and equality, and is committed to creating a safe and **inclusive culture where diversity in all its forms is valued and everyone is encouraged** to be the best they can be.
- Dedalus values the diversity that exists in the roles that operate within the organisation and maintains processes capable of developing the empowerment of all personnel, including those of the numerically less represented sex, in business activities.

The main principles are:

- Each of us leads with respect, by example and by being a role model to colleagues, managers, leaders, suppliers, customers and others.
- By embracing difference, eliminating prejudice and challenging negative behaviour, we can be part of a culture where we all feel a sense of belonging.
- Through the diversity of our backgrounds, experiences, opinions or beliefs, together we build a sustainable business.

In order to promote and ensure the achievement and maintenance of this objective, Dedalus focuses its efforts on the following 6 areas of action, as defined by UNI/PDR 125:

1. Culture and strategy



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2. Governance
3. Human resources processes
4. Opportunities
5. Compensation Equity
6. Parenting

Dedalus intends to ensure gender equality by means of concrete actions that, in addition to meeting the requirements/KPIs established in each of the areas mentioned, are of real and concrete value to the women present in the organisation, who are the real stakeholders.

The organisation, wishing to pay attention to this satisfaction at all times and in all circumstances of a woman's working life in the organisation, has chosen to manage all the this "life cycle" through the following aspects:

- Selection and recruitment
- Career management
- Pay equity
- Parenting, care
- Work-life balance
- Abuse and harassment prevention

For each of the following aspects, Dedalus Italia has established more specific policies, which are set out below. To each policy expressing the principles by which Dedalus Italia is inspired, the organisation has associated specific and measurable equality objectives indicated in the strategic plan.

6.3 Specific gender equality policies

Dedalus Italia, through the analysis of its business processes, has understood and defined the principles to be respected in relation to each of the following points. These principles are the criteria that inspire the processes to be implemented:

- the existing gaps in relation to the indicators established by the UNI/PDR 125 practice
- the needs of women in the organisation, considered as the main stakeholders in the concrete results of the organisational model



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6.3.1 Selection and recruitment policy

Dedalus Italia respects the following principles in the process of selection and recruitment of personnel to be employed in its business activities, with a view to improvement:

- The selection of candidates must be gender neutral.
- Selection criteria must take account of requirements relating to personal qualities such as professionalism, competence, specialisation and experience.
- Selection must not include issues of marriage, pregnancy and family responsibilities.
- Selection must take into account the need for a balanced representation of women and men in the workforce in relation to the total number of people present.
- Top management and budget-delegated roles must be distributed in a gender-balanced manner.
- The position envisaged at the time of recruitment must include a salary that is commensurate with the tasks and responsibilities and not influenced by gender.
- Selection must take into account that the percentages of women and men whose contracts provide for variable remuneration are balanced

6.3.2 Career management policy

Dedalus is aware that the economic results achieved also depend on the people who work there, and all career development opportunities are intended to relate solely to the results and merits of the person, regardless of gender. Dedalus manages the careers of its employees with a view to improvement and in accordance with the following principles:

- The allocation of roles and tasks must take into account the gender balance of management.
- The design and presentation of career paths must be gender inclusive.
- Employee career paths are accessible to all persons who can transparently verify that gender balance is being maintained.
- The working environment, where most of the day is spent, must provide opportunities (technological and physical) for all people to express themselves and to feel safe and comfortable.
- Skills and awareness training is a fundamental process aimed at removing any career barriers and restoring any gender balance in management.



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- When staff leave the organisation in the event of redundancy, they are closely scrutinised by reviewing gender attrition.
- Promotions always take into account gender balance at the functional level.
- Ensure that there is a gender balance among panel speakers at roundtables, events, conferences or other events, including scientific ones.

6.3.3 Wage equity policy

Dedalus aims to ensure equal pay for men and women during recruitment and throughout the careers of its employees. The organisation does not asymmetrically take into account the costs of remunerating people of different genders. In determining, paying and adjusting remuneration, the organisation shall respect the following principles:

- People's remuneration shall be recognised in relation to their role and responsibilities, and any additions to this remuneration in the form of benefits and bonuses shall be understood to be based solely on the results achieved and recognised.
- Salaries, bonuses and the allocation of benefits are documented and accessible to all employees in the interests of transparency
- Remuneration, bonus and benefits criteria are documented and accessible to the entire staff
- Any member of staff has the right to report any inequalities

6.3.4 Parenting and care policy

Dedalus does not want to be an obstacle to parenthood and supports motherhood and fatherhood through activities designed to meet the needs of those who, due to their parental status, have to balance their commitment between work and new emerging needs. The organisation supports this intention in the light of the following principles

- Motherhood and parenthood are supported through training, information and reintegration programmes.
- Support maternity before, during and after childbirth
- Paternity leave is promoted so that all potential beneficiaries can benefit from it for the full statutory period.
- Support the return from leave through specific reintegration initiatives
- Dedalus plays an active role in supporting the activities of caregivers (care of the unborn child) with concrete initiatives.



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6.3.5 Work-life balance policy

Dedalus wants to offer its employees the opportunity to manage the time they devote to life and work by striking a balance that takes into account both the company's objectives and the employee's psycho-physical well-being, which results from greater freedom of self-determination. The principles of work-life balance are as follows:

- Work-life balance measures are aimed at all employees, regardless of gender.
- Dedalus adopts part-time working for roles where possible, flexible working hours and smart working.
- Dedalus allows telematic connection with all employees working externally (regardless of contract) for work processes and participation in meetings.

6.3.6 Abuse and Harassment Prevention Policy

Dedalus rejects all forms of abuse and harassment and therefore has a **zero-tolerance** policy for the prevention and repression of this phenomenon. Dedalus implements its prevention policy through concrete actions, the principles of which include:

- Identifying the risks of abuse and harassment
- That Dedalus plans preventive actions in relation to this risk
- The possibility of reporting suspicions and/or facts relating to abuse and harassment through the company's whistleblowing procedure.
- Dedalus' absolute protection of whistleblowers from possible subsequent retaliation.
- That Dedalus analyses and understands all incidents of abuse and harassment
- The development of courteous and gender neutral communication
- Dedalus' absolute protection of reporters from any subsequent retaliation
- That Dedalus analyses and understands all incidents of abuse and harassment
- The development of courteous and gender neutral communication

6.4 Actions developed

These objectives are made concrete through **the planning of activities to improve the gender equality management system**, the achievement and updating of which is periodically verified.



7 OUR CORE VALUES

We strongly believe that in order to achieve real quality at 360 degrees, each of us must adopt the following principles on a daily basis:

- **act with determination**, because quality and customer satisfaction are obtained only through concrete actions, with a constant commitment and a deep sense of responsibility of everyone of us;
- get it **right the first time**, with the aim of meeting product and service requirements, including applicable regulatori requirements;
- be **prompt in responding** to incidents and react with a **desire to remove** the real **cause** of it;
- act by implementing **careful and continuous prevention**, just as we do when our own interests are at stake;
- **be always aware of the repercussions** that **our actions** and decisions have on the other part of the organization;
- **consider as a "Customers" the colleague who receives the result of our work**: in fact customers are not only the end users, but also our colleagues, other departments in the organization and our external collaborators; we have to do our best to give them the best inputs, because if everyone of us do it this way, the overall result will be excellent and always the very maximum possible
- be aware that **poor adherence to** the product and service **specifications creates a high cost** for the organization, in terms of the need to fix products or **re-deliver services** and in terms of **loss of image in the market**.

We believe that **competitive advantage** is firmly linked to **intellectual capital** (to be achieved through continuous discussion and involvement of our employees in the internal processes and in the generation of solutions) **and** innovative business **organization**: we think that the most interesting minds are those that know how to unleash their imagination, ask new questions and find answers, face challenges and plot a new path for those who follow.

We believe that a successful business organization should be based on the **passion of** its people, on a continuous and effective internal communication, on the **tension to problem solving**, on the goal to produce **value and satisfaction** for its stakeholders and **the customer** in particular: in short, we want to be a strategic and irreplaceable partner and not just a simple supplier for our customers.



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